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12 *Attorneys for Defendants*
13 *Unforgettable Coatings, Inc.;*
14 *Unforgettable Coatings of Idaho LLC*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 JOSE ISMAEL ZUNIGA, on behalf of himself
18 and all others similarly situated,

19 Plaintiff,

20 vs.

21 UNFORGETTABLE COATINGS INC.;
22 UNFORGETTABLE COATINGS OF IDAHO
23 LLC; DOES 1 through 50; inclusive.

24 Defendants.

25 Case No.: 2:21-cv-01221-JCM-VCF

26 **STIPULATION TO EXTEND DEADLINE
FOR DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

27 **(THIRD REQUEST)**

28 IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff"),
1 through his counsel, Gabroy Law Offices, and Defendants, Unforgettable Coatings, Inc. and
2 Unforgettable Coatings of Idaho, LLC, ("Defendants"), by and through their counsel, Jackson
3 Lewis P.C., that Defendants shall have an extension up to and including September 6, 2021, in
4 which to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and
5 based upon the following:

6 1. Plaintiff filed his Complaint on May 25, 2021 in the Eighth Judicial District Court
7 of Clark County, Nevada, Case No. A-21-835257-C. The Summons and Complaint were served
8 on or about June 8, 2021.

9 2. Defendants' filed their Petition for Removal of Civil Action from State Court on
10 June 29, 2021.

3. Defendants' Answer is currently due August 6, 2021.

4. This is the third request for an extension of time for Defendants to file a response to Plaintiff's Complaint.

5. The parties are discussing a potential resolution of Plaintiff's claims, which would render any such response unnecessary.

6. This request is made in good faith and not for the purpose of delay.

7. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 5th day of August, 2021.

GABROY LAW OFFICES

JACKSON LEWIS P.C.

/s/ Christian Gabroy

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Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

Contract

Dated: